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U.S. BARGARUPIC'S COURT

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Claude D. Montgomery, Esq. Aviva J. Halpern, Esq. SALANS 620 Fifth Avenue New York, NY 10020 (212) 632-5510 cmontgomery@salans.com ahalpern@salans.com Creditor Pro Se

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re

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N.C.P. Marketing Group, Inc., et al.,

Debtors.

CHAPTER 11 Joint Administration

Case No. BK-04-51071

SALANS' AMENDED JOINDER
AND RESPONSE TO THE
MOTION OF THE BLANKS
PARTIES FOR AN ORDER
COMPELLING REJECTION OF
NONEXCLUSIVE LICENSE AND
FOR RELIEF FROM THE
AUTOMATIC STAY TO
EXERCISE APPLICABLE
NONBANKRUPTCY RIGHTS

Salans, a creditor in the above-captioned chapter 11 case, hereby supports and joins in the response of the debtors and debtors-in-possession (the "Debtors' Response") to the Motion of Billy Blanks, Gayle Blanks, and BG Star Productions, Inc. (collectively, the "Blanks Parties") for an Order Compelling Rejection of Nonexclusive Trademark License and Relief

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1 from the Automatic Stay to Exercise Applicable Nonbankruptcy Rights (the "Blanks Motion"). 2 3 Salans states further, that in the unlikely event that the Debtors' require the Blanks Parties' 4 consent to assign the License, such License will then be a potentially valuable asset of the estate 5 and should be preserved. For the foregoing reasons, the Blanks Parties' Motion should be 6 denied. 7 8 Respectfully submitted, 9 Dated: New York, New York 10 October 13, 2004 11 **SALANS** 12 13 By: /s/Claude D. Montgomery Claude D. Montgomery, Esq. 14 Aviva J. Halpern, Esq. 15 Salans 620 Fifth Avenue 16 New York, NY 10020 212-632-5500 17 Creditor Pro Se Dated: Reno, Nevada 18 October 13, 2004 19 WATSON ROUNDS 20 21 By: SBN 893 Kelly G. Watson, Esq. 22 Watson Rounds 23 5371 Kietzke Lane Reno, Nevada 89511 24 (775) 324-4100 Attorneys for Salans 25 26 27 28

1 CERTIFICATE OF MAILING 2 I hereby certify that I am an employee of the Law Office WATSON ROUNDS, a 3 Professional Corporation, and that on this date I deposited for mailing, postage prepaid, at 4 Reno, Nevada, a true copy of the following document: 5 6 SALANS' AMENDED JOINDER AND RESPONSE TO THE MOTION OF THE BLANKS PARTIES FOR AN ORDER COMPELLING REJECTION OF 7 NONEXCLUSIVE LICENSE AND FOR RELIEF FROM THE AUTOMATIC STAY 8 TO EXERCISE APPLICABLE NONBANKRUPTCY RIGHTS 9 Addressed as follows: 10 Brian Bash, Esq. Jennifer A Smith, Esq. 11 Jeffrey Baddeley, Esq. Lionel Sawyer & Collins Thomas M. Wearsch, Esq. 50 W. Liberty Street, Suite 1100 12 Baker & Hostetler LLP Reno, NV 89501 13 1900 East Ninth Street, #3200 Cleveland, OH 44114 Michael S. Greger, Esq. 14 Allen Matkins Leck Gamble & Mallory 199 Main Street, 5th Floor Michael A.T. Pagni, Esq. 15 McDonald Carano Wilson Irvine, CA 92614 16 50 W. Liberty Street, 10th Floor Reno, NV 89501 William B. Cossitt, Esq. 17 Office of the U.S. Trustee 18 David J. Jurkiewicz, Esq. 300 Booth Street, Rm. 2129 Bose McKinney & Evans, LLP Reno, NV 89509 19 2700 First Indiana Plaza 135 North Pennsylvania Street 20 Thomas A. Lee, III, Esq. Indianapolis, IN 46204 Becket and Lee LLP 21 P. O. Box 3001 Janet L. Chubb, Esq. Malvern, PA 19344 22 Jones Vargas 100 W. Liberty Street, 12 Floor 23 Joseph H. Bocock P. O. Box 281 Ross A Plourde 24 Reno, NV 89504 McAfee & Taft 10th Floor, Two Leadership Square 25 Oklahoma City, OK 73102 26 Dated: October 13, 2004 27 An Employee of Watson Rounds

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